

EXHIBIT “B”

CILENTI & COOPER, PLLC

ATTORNEYS AT LAW

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August 28, 2012

Via Facsimile (718) 891-2274

Theodore Alatsas, Esq.

Alatsas & Taub, P.C.

2115 Avenue U

Brooklyn, New York 11229

Re: **Jeovanny Garcia, et. al. v. AKR Corporation, et. al.**

Case No.: 11cv6184(RRM)(RLM)

Dear Mr. Alatsas,

We write with reference to the order of Judge Roanne L. Mann, dated August 28, 2012, which states, in part, "[AKR Corporation, Nasrullah Kamran and Mohammad D. Arifee] and their attorney are directed to pay the reasonable expenses, including attorneys' fees, caused by their discovery violations."

We enclose an invoice for such expenses and ask you to kindly remit payment to "Cilenti & Cooper, PLLC" on or before September 14, 2012.

Thank you for your attention to this matter.

Sincerely,



Peter H. Cooper

cc: **Via Facsimile (212) 742-0005**

Robert G. Androsiglio, Esq.

Radna & Androsiglio, LLP

110 Wall Street

11th Floor

New York, New York 10005

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INVOICE FOR SERVICES

Date & Attorney	Transaction	Hours	Hourly Rate	Amount Due
7/31/12	CORRESPONDENCE TO T. ALATSAS RE: FAILURE TO RESPOND TO DISCOVERY	.3	\$400	\$120
8/9/12	CORRESPONDENCE TO T. ALATSAS RE: SECOND GOOD FAITH DEMAND/ REFUSAL TO RESPOND TO DISCOVERY	.3	\$400	\$120
8/13/12	DRAFT MOTION TO PRECLUDE/ COMPEL DISCOVERY	1.7	\$400	\$680
8/15/12	RECEIVE/REVIEW ORDER TO SHOW CAUSE	.2	\$400	\$80
8/20/12	RECEIVE/REVIEW DEFENDANTS' LETTER/OPPOSITION TO MOTION AND INTERROGATORIES	.5	\$400	\$200
	DRAFT REPLY IN RESPONSE TO DEFENDANTS' OPPOSITION AND IN SUPPORT OF MOTION	.75	\$400	\$300
TOTAL.....				\$1,500.00

PLEASE REMIT PAYMENT TO:

Cilenti & Cooper, PLLC

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